

AKIN GUMP
STRAUSS HAUER & FELD LLP

Attorneys at Law

TERENCE J. LYNAM
202.887.4045/fax: 202.887.4288
tlynam@akingump.com

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VIA FACSIMILE

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10022

Re: *SEC v. Galleon Management, LP, et al.*, 09 Civ. 8811 (JSR)

Dear Judge Rakoff:

We are in receipt of the Court's Memorandum Order entered late this afternoon granting the SEC's motion to compel and ordering Mr. Rajaratnam to produce the wiretap recordings to the SEC and other interested defendants by February 15, 2010.

On behalf of Mr. Rajaratnam, we respectfully move for a stay of this Order pending appeal to the Second Circuit. We also move the Court to certify its ruling for immediate appeal pursuant to 28 U.S.C. § 1292(b), for the reasons stated in our recent letter briefs to the Court. In the alternative, we request that the Court grant an administrative stay of sufficient time (in light of the Court of Appeals' scheduled closure for five of the next six days) to permit the Second Circuit to consider and to adjudicate our request for a stay pending appeal and/or appeal.

Respectfully submitted,



Terence J. Lynam (*pro hac vice*)
John M. Dowd (*pro hac vice*)
William E. White (*pro hac vice*)

Attorneys for Defendant Raj Rajaratnam

cc: Valerie A. Szczepanik, Esq.
All Defense Counsel of Record